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Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO EXCLUDE REPORT AND
TESTIMONY OF DR. LAMBERTUS
HESSELINK**

Courtroom: 8, 19th Floor
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Declaration ISO Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this Administrative Motion to File Under Seal Portions of its Motion to Exclude Report and Testimony of Dr. Lambertus Hesselink (the “Administrative Motion”). Specifically, Otto Trucking requests an Order granting leave to file under seal the confidential portions of the following documents:

| Document | Portions to Be Filed Under Seal |
|---|---------------------------------|
| Otto Trucking’s Motion to Exclude Report and Testimony of Dr. Lambertus Hesselink | Highlighted Portions |
| Exhibit 1 to Lin Declaration – excerpts to Opening Report of Dr. Lambertus Hesselink | Entire Document |
| Exhibit 2 to Lin Declaration – excerpts to Reply Report of Dr. Lambertus Hesselink | Entire Document |
| Exhibit 3 to Lin Declaration – excerpts to the transcript of the September 26, 2017 deposition of Dr. Lambertus Hesselink | Entire Document |

The highlighted portions of Otto Trucking’s Motion to Exclude Report and Testimony of Dr. Lambertus Hesselink and the entirety of Exhibits 1, 2, and 3 to the Lin Declaration contain information that Plaintiff Waymo LLC (“Waymo”) has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Administrative Motion and its supporting documents that merit provisional sealing.

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2 Dated: October 2, 2017

Respectfully submitted,

3 By: /s/ Neel Chatterjee

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 2, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 2, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE